

LOCAL BANKRUPTCY FORM 9013-4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Chad Anthony Lucabaugh

Debtor(s)

AJX MORTGAGE TRUST I, A DELAWARE
TRUST, WILMINGTON SAVINGS FUND
SOCIETY, FSB, TRUSTEE

Movant

v.

Chad Anthony Lucabaugh
Jack N. Zaharopoulos, Esq., Trustee

Debtors/Respondents

CHAPTER 13

CASE NO. 15-04588 HWV

Nature of Proceeding:

Motion for Relief from Stay

Document #:132

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance: Parties are negotiating the terms to resolve the Motion for Relief.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: August 23, 2021

/s/ Sarah McCaffery, Esquire
Sarah McCaffery, Esquire
Attorney for Movant
Phone Number: 215-942-2090

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.